

**From:** [REDACTED]  
**To:** [SheffieldPlan](#)  
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**Attachments:** [Submission to Consultation on Sheffield Plan \(Draft \) Part 1-20 th Feb 2023 from Jan Symington.rtf](#)

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Please find attached my comments on  
The Sheffield Plan: Our City Our Future- Publication (Pre-Submission) Draft

Sent by  
Jan Symington



I should like to be notified of the next stages of the Plan, if possible. ( by e-mail. )

**Submission to Consultation on The (Pre-submission) Draft Sheffield Plan 2022, Feb 2023**

from Jan Symington, [REDACTED]  
Former resident of Loxley and Secretary of Loxley Valley Protection Society (LVPS) and member of the Friends of Loxley Valley (FOLV).

*I have picked sections, policies and points I feel relevant to to the Loxley Valley within the NW sub-Area to comment on, and where possible will cross reference these comments with those of other interest Groups. I support the content of the submission made by FOLV without attempting to reiterate. I should like to promote the inclusion of the Joined up Heritage, Heritage Strategy within the plan as well as the Waterways Strategy adopted by the council nine years ago but not mentioned in the Plan.*

The Loxley Valley has been described as a green corridor from the built environment at Malin Bridge to the Golden Frame of the Peak District beginning beyond the Sheffield Green Belt at Damflask. It is important for its river, its heritage, its wildlife, its landscapes and its beauty. I hope the Sheffield Plan can do it justice.

## **Part 1**

### **SP1**

#### **Growth Plan and Spatial Strategy**

Section 3.4- I support the Principle that 'Sheffield's development needs to 2039 will be met within the existing urban areas, largely without need to remove land from the Green Belt.'

Section 3.5- Support bullet points 1-10

Section 3.6 -Support use of brownfield sites rather than releasing Green Belt land.

Section 3.9- Support - Most housing development to be located within existing urban areas, with some limited additional development in the larger villages in NW Sheffield Sub -Area ( ie Oughtibridge, Worrall and Wharncliffe Side). Agree the small villages washed over by the Green Belt are not sustainable locations for significant new development.

Support the section on **Economic Growth** and the need for ongoing flexibility of allocation of land to employment and housing. The pandemic has taught us that things can change rapidly economically requiring a change in the way many are working which will have an effect on planning strategy.

#### **Policy- SP2- Spatial Strategy**

Support-Each Sub-Area has its own development strategy. SA1-SA9

4.54-Outlines Areas and villages within the sub-area. The NW Sub-Area has been increased in size since the UDP was drawn up.

4.56-describes the popularity of the Loxley and Rivelin Valleys for outdoor recreation, connecting the city to attractive countryside before reaching the Peak District. Acknowledges Loxley and Rivelin Valleys almost entirely Green Belt, reaching the borders of the Peak District National Park.

However it does not mention the importance of the industrial heritage which used

the water power of these rivers, which lead to Sheffield becoming a major manufacturer of iron and steel nor the importance of the biodiversity of these valleys now. Nor the problem of increasing public access while improving and maintaining biodiversity. See below

### **Policy SA2- NW Sheffield sub-area**

The Sub are is down to deliver in the region of 1015 homes in the named larger villages.

SA2 b) talks of delivering several Site Allocations, identified by number, could these also be named here in the text?

I support the sites remaining unallocated for housing in the North West sub-area. Particularly the Hepworths site in the Loxley Valley, deemed an unsustainable site at public inquiry (appeal no- APP/J4423/W/20/3262600). See the detailed comments by FOLV and other local interest groups mentioned regarding this site.

### **Policy T1- Enabling Sustainable Transport**

An important part of the sustainability of a site is having sustainable transport. Unlike Hepworths, where the transport offer was not deemed sustainable, old factory sites in the Upper Don Valley, are on a more major main road and also have the possibility, if there was the will to do it, of reopening the rail line which runs from Stocksbridge past the rear of the Oughtibridge mill site into Sheffield, as a viable alternative means of transport in the future to an already busy main road.

### **Blue and Green Infrastructure-**

5.20s Support the importance of safeguarding of the Blue and Green infrastructure and note the principle of Fair Access in 5.22 for health and exercise of Sheffield people. This is all very well but with land under pressure to provide multi-functional roles, in many places, a balance needs to be struck, between public access and other functions such as improving and maintaining biodiversity and environmental net gain in 5.25, as well as providing for flood storage, safeguarding heritage and combatting climate change.

Public access, though desirable from the point of view of public health, is often in conflict with improving and enhancing habitats to increase biodiversity, and leads to similar conflicts between development and wildlife in part 2 policy GS5.

### **BG1-Blue and Green Infrastructure**

**Support this policy in Section 1-** where it states 'All blue and green infrastructure in the city will be protected managed and enhanced, wherever possible, to help increase biodiversity' etc. It gives 'very significant weight to the protection and enhancement of the Green network'. Etc 'especially the main river corridors including the Rivelin and Loxley'. As well as 'major parks'.

'Valuable green spaces will be protected from inappropriate built development'

But BG1 is also referred to in Part 2 of the Plan-Section 8.3 and says it 'Identifies the important green and blue infrastructure in the city. **The policies in this section set out how those important features will be protected and enhanced as part of new development'**

'This is a different proposition from the Policy as written in Part 1 which does not mention 'As part of a new development' at all. It seems the additional 5 words set up a conflict between BG1 in part 1 and BG1 in part 2 and should be removed. However if there can be development, this should be mentioned in part one also. Otherwise the policy maybe unsound.

Given the current parlous state of nature in the country, acknowledged in the Plan and the biodiversity emergency declared in Sheffield in response to this, these **important** and **valuable** green spaces should be fully protected and not be 'part of a new development' or rely on development for this improvement.

There are also numerous heritage assets involving the historic use of waterpower within these blue green areas, especially on the Loxley and Rivelin, which should also be included in BG1 as well as DE1 because they are so much part of the blue green environment and have often become habitats in their own right.

### **Policy D1- Design Principles and Priorities.**

Support Policy D1 putting Heritage in a) at the top and centre of the policy to develop places which are rich in character, including the heritage assets linked to water power in the bottom of the Loxley valley. And in b) the distinctive landscapes of river valleys, dramatic hillsides, tree cover and views out into the Peak District.

Much of the distinctiveness of the landscape of the Green Belt leading to the Peak District, which is very much part of Sheffield's rural Heritage in the NW Greenbelt, relies on small traditional features linked to the villages and the traditional stone farmsteads that make the landscape character and include- Stone walls (both dry and mortared), tooled stone gateposts, Stone troughs, sheep holes and stone pathways. As in the Loxley Valley Design Statement (LVDS). The importance of these should also be included in D1a), under 'The cities rural setting, topography and landscapes'.

The Importance of the Loxley Valley Design Statement needs reassessing in relation to the SPG it added to the UDP and its relevance to the Sheffield plan, for possible inclusion somewhere in the Sheffield plan. (Including the importance of Views as mentioned in D1 b)

The Heritage strategy, supported by SCC, calls for greater attention in the Plan on the role of Heritage its conservation and enhancement than it was given in the UDP and Core Strategy. It needs including in the Sheffield plan as well as the Waterways Strategy adopted by the council and Environment Agency.

## **Sheffield Plan (Draft) Part 2-Consultation notes Feb 2023**

Welcome the response to the climate emergency in the Plan and the concept of creating an environmentally sustainable city, without further urban sprawl or loss of Green Belt.

### **Policy ES1 Measures required to achieve reduced carbon emissions in new development**

#### **Support whole of this policy Particularly**

**ES1 c) Retention and reuse of buildings** – This policy is particularly valuable in the Green Belt where traditional stone structures that blend into the landscape need a new purpose.

Would support Joined up Heritage Sheffield's comments on tightening the policy, to combat release of carbon by demolition.

ES1 closely aligned to GS2 covering extension, replacement and reuse of buildings in the Green Belt.

### **Policy ES2 – Renewable energy generation**

Though would thoroughly support this policy, ultimately the impact of climate change itself has to be assessed against what is considered the damaging siting of renewable energy generators and a balance struck on which is the lesser of the two evils, going forward.

Other forms of renewable energy generation also need to be considered, Our waterways could also be a source of hydro power if designed sensitively and in such a way as to not damage heritage assets, sensitive landscapes, or harm biodiversity. While flood protection measures could include the use of existing reservoirs, to hold back excess water from the rivers flowing into the city.

### **ES4 – Other Requirements for the sustained Design of Buildings**

ES4e Include - Site allocations should not include sites in known flood risk areas, without serious mitigation to flood proof buildings or prevent properties flooding.

### **A Green City- Biodiversity Emergency Response.**

Sections 8.1-8.4 need cross referencing with policy BG1 in part 1, p128

As already stated in Part one

Section 8.3 States, 'BG1 identifies the important green and blue infrastructure in the city. The policies in this section set out how those important features will be protected and enhanced **as part of new development**'

It also states in the policy, that - 'Valuable green spaces will be protected from inappropriate built development'.

This could conflict with Development in Urban Green Space Zones (Policy GS1).

### **Policy GS1- Development in Urban Green Space Zones**

a)ii Needs to guard against the loss of open spaces for sporting activities that have been sanctioned in the past, (eg loss of cricket pitches in Stannington, Hare and Hounds (now housing) at Malin bridge, Gas Club And in Loxley, Black Lane, when alternative facilities the council said would replace them are only to be found across the city.

This policy does not fit with the concept of sustainable neighbourhoods.

## **Policy GS2 – Development in the Green Belt**

Support but feel greater Green Belt protection needed as in UDP.

## **Policy – GS3- Landscape Character –**

The description of the landscape character in this policy, contrasting valley shape in Uplands with Lowlands and the description in 8.12 which simply contrasts steeper sided valleys in the NW with more shallow valleys in the SE is a more varied than described. To say, 'development will be expected to protect and enhance the setting of the Peak District National Park including the views in and out of the National Park alone is not protecting this valuable and beautiful countryside from development.

The land framing the Peak District National Park in the Loxley valley Green Belt should be maintained as closely as possible to Peak Park standard. It has had the additional protection of Area of High Landscape Value (AHLV) from the UDP removed in the Sheffield Plan but still needs an additional designation to acknowledge its special relationship to the National Park.

## **Policy GS4 – Safeguarding the best and most versatile Agricultural land.**

with increasing food insecurity, it is good that the best agricultural land is protected. It should be fully protected against development, full stop! No ifs and buts.

## **Policy GS5- Development and Biodiversity.**

The Loxley Valley should have more statutory protection, than simply being designated a Local Wildlife Site. It should be considered for further designation having lost its status as an Area of Special Character, both for its wildlife and its heritage features. These features have become wildlife habitats but need looking after in their own right also. We support protection of LWS being given significant weight. Support -Where there is damage or neglect to a designated site this will not result in a presumption for development.

GS5, by stating, 'wherever relevant, development should, protect, enhance deliver, provide, reduce, promote, restore, minimise, incorporate all these wonderful wildlife enhancing measures', (which although laudable), does not acknowledge that by its very nature development in itself reduces habitat and increases disturbance by human activity to the detriment of the wildlife.

This policy doesn't seem strong enough to prevent damage to wildlife habitats. (Development, together with modern farming practices is how this country has lost so much of its wildlife and created this emergency.) While gardens within developments can enhance some forms of wildlife, truly wild undisturbed areas are also necessary for other species.

A great deal of concern was expressed at the Hepworths' Public Inquiry regarding the considerable wildlife on site and the developer's claim they would protect, enhance etc while allowing for access through the site by residents of the development which would inevitably cause disturbance.

See Part 1 notes on Section 5.22 'fair public access' which cross references with these comments on GS5.

Similarly there is concern for the waterway heritage assets where changes to or loss of these would increase biodiversity. So a balance needs to be struck to do least environmental harm.

### **Policy GS6 – Biodiversity Net Gain ( BNG)**

BNG should be as much as possible rather than limited to north of 10%, given losses of some species of 90%. **Any** development on many sites would be detrimental to wildlife and to rely on development to increase BNG within some sites will only lead to further loss of habitat.

Again there should not be a reliance on development to deliver BNG. Sites need BNG without necessarily being developed!

GS6 f) Relying on long term management plans, assumes compliance after the development is completed and those carrying out the management plan remaining in business. Realistically we know even conditions on an application often don't get complied with. Landscaping doesn't get renewed, or is of minimal wildlife value. So holding a developer to something for 30 years may be a difficult task. Landscaping should include native hedging and planting as both a food source, shelter and for nesting.

### **Policy GS7 - Trees Woodlands and hedgerows.**

a) So many sites are completely cleared prior to a planning application going in. How can this be prevented? Sites should not be allowed to be cleared of trees or vegetation in the pre-application stage, so that any Trees and if possible other notable features on the site can be incorporated into the application plan as part of the design.

b) support

c) Trees adjacent to a development should not be damaged (other than by careful expert pruning) to facilitate or maximise a development but should be considered as assets in terms of the design. Development should not take place within a given distance of a particular tree to prevent the perceived necessity for felling at a later date and to prevent damage to the tree by compaction of the root protection area. (RPA)

d) Any felled trees should where possible be replaced like with like, or with native trees that are good for wildlife.

e) Support – Though mature street trees should be professionally maintained not felled!

f) support

g) support

H) add 'and to replace them if they do fail'.

The sensitive maintenance of much of the woodland for wildlife in the Loxley valley ( as well as many other parts of the city) needs reassessing if habitats are to be safeguarded and BNG increased to any where near a recovery point in the future.

In addition, over 90% of unimproved pasture, valuable for wildflowers and the insects and birds they support including beloved butterfly species, has been

recently lost with so called improvements to the land leading to grass monoculture. As well as the production of silage instead of hay. These processes need reversing and the meadows could return in Loxley Valley, if only initially on the steep slopes with thin soil on the Stannington side of the Loxley valley.

### **Policy GS9- Managing flood risk**

Support a)-e)

f) LVPS did not support the choice of the flood storage area on the Rivelin. While acknowledging the water will have to go somewhere to avoid homes and businesses flooding, we said at that consultation we would like to see existing reservoirs used for management of flood water, where possible. Proposed flood Storage Areas were removed from the Loxley because an area containing heritage assets should not be put at risk of being deliberately flooded.

In GS9 point a) following 'New development will be permitted where it' -

Only a minimum 8m 'set back' of development from the river bank of main rivers is proposed and only a minimum of 3m from ordinary watercourses. The Hepworths site, flooded to a depth of 4 feet in some of the buildings in 2007, this set back would be insufficient both to protect any development from this level of flooding and to protect wildlife from disturbance from the development.

I support the comments of the Sheffield and Rotherham wildlife trust in their recommendation for a wider set back of 10-20m. Fortunately this site has still not been allocated as housing land and has been deemed unsustainable. But even on other sites the set back should be what is necessary to mitigate both the flood risks on the site and the risks to biodiversity.

Support GS9 b) to k), though we may not yet have seen or imagined what flood mitigation from weather events may be needed in future with the impending climate crisis, so policy should remain flexible and hopefully future proof for the life of the plan.

### **Policy GS10 Protection and enhancement of water resources**

Support-But with the addition of the inclusion which notes many of Sheffield's water bodies are contained within channels which are part of the Industrial Heritage of water powered industry within the City and more rural river valleys, particularly the Rivelin and Loxley. Support - both Joined up Heritage Sheffield's comments on this and their Heritage Strategy.

This is not just about protection and preservation, but also aims to understand and celebrate, champion, exploit, ( hopefully in the most positive way without harming), educate about and recognise the well-being and environmental benefits of, heritage. This needs taking into account in this Policy. (Though would not necessarily support complete retention of all heritage assets where there is conflict with BNG, as at weirs, or for necessary future generation of renewable power, provided a balance is achieved giving maximum benefit to wildlife while creating minimum damage to heritage assets.)

Also support the comments by Simon Ogden on the (adopted) Sheffield Waterways Strategy as well as its need for inclusion, in the Plan.

Particularly section 3.5 of his comments on Heritage Culture and History – where the aims of the Waterways strategy and those of the Joined up Heritage group



coincide.

He also points out that the 'vision of growing a coherent connected well cared for network of green blue spaces' is not so strongly presented in the Sheffield Plan as in the UDP Policy GE17 and in Policy CS73 in the adopted Core Strategy. This should be strengthened.

### **A Well Designed City**

#### **Policy DE1- Local context and development character**

Support 9.1 which states, ' The industrial heritage of the city is nationally important' It should be treated as such, much having already been sacrificed in the past to piecemeal development.

Support 9.2 on Sheffield being a city with many different vernacular characters from area to area, without a single planning solution.

The Plan aims to create a city based in 9.3 on a combination of national and local policy on good design.

In 9.5- Where an area's character is distinct, it is easier to assess whether a development is in character with the area, or not BUT in 9.6 when an area has a lack of distinctiveness, it is suggested more imaginative outcomes can be accepted. Great care is needed with this approach and the future character of large parts of our city should not be left to developers and their profit lead commercial interests!

#### **Policy DE2 – Design and alteration of buildings.**

Support this policy Particularly c) Character buildings, should be retained etc. In p) need to state type and specification of lighting that satisfies criteria for sensitive areas. Should also specify, what exactly an 'unacceptable impact' is which wouldn't be the same for other people and for biodiversity. To prevent disturbance to wildlife the threshold would have to be tighter.

#### **Policy DE3 Public Realm and Landscape design –**

h) No mention of the role in landscaping of using native species to promote wildlife even within the urban environment, important especially for bird and insect species.

Or Incorporating Heritage features when landscaping.

Or in n) Specific safety of women!

in DE3 c) and d) Support use of trees (both retained and newly planted) and other cooling shade creation features such as water, especially in areas where little shade exist ie in central area of the city. This policy should be used to mitigate the effects of increasingly hot summers. The recent loss of many healthy street trees is regretted.

#### **Policy DE4 Design of Streets Roads and Parking**

m)Protect and enhance existing public rights of way and access -  
Add- Preserve the heritage of historic street patterns.

### **Policy DE7 Advertisements**

Support whole of this Policy, but think Heritage assets need mentioning as also needing protection from excessive signage possibly in c) d) e) and i)?

### **Policy DE9 Development and Heritage assets.**

Policy welcomed by Joined up Heritage Sheffield. Support their comments. Support all this Policy. It is particularly relevant to Loxley Valley and especially the Hepworths site.

Particularly support these sections-

a) they give weight to both designated and none designated assets.

b) brings in significance of the asset and its setting

e) which makes the most of opportunities to enhance or better reveal the significance of the asset.

h) Help secure a sustainable future for heritage assets especially those identified as being at greatest risk of loss or decay.

### **Comments on the Northwest -Sheffield Plan Map compared with the NW UDP map**

**Map quality-** A paper copy of the NW Area Map, accompanying the Sheffield Plan, was obtained from the Council, (for which, many thanks), in order to compare the detail of the changes from the UDP map. Before any detailed comparisons were made it was obvious that the maps were very different not only in style but in quality also. In the UDP map, there is a great deal of geographical detail, showing where buildings, farmsteads, small settlements, roads, lanes, and footpaths are, in relation to the planning area boundaries. This is important when there is a need to see whether a particular small feature is within a particular planning area. Unfortunately this information is not present on the Sheffield Plan paper Map. If this is the detail that is going to be on the final version, someone with just sight of a paper copy cannot tell if a site is within a designated planning area or not.

When viewing the interactive map there is more geographical detail than on the paper copy but still not as much as the on the UDP map.

Joined up Heritage Sheffield in Appendix A, have also commented, on the quality and changes needed to the digital map.

### **Removal and addition of sites to and from the Green Belt-**

There is concern about the suggested removal of several sites from the Green Belt, presumably as they are now developed. Retaining the Green Belt designation, as on the Dysons' site on Stopes Road, now housing, protects sites from further development leading to overdevelopment.

There are also 2 slivers of land below the Acorn estate proposed as additions to the Green Belt. Suggested additions to the Green Belt were resisted by SCC in the previous SDF consultation. In the current situation because the removals in the NW outweigh the additions there seems very little to gain but implies that the Green Belt boundary is negotiable with regards to development. This should not be the case.

**Areas of special character (ASC)-** Which acknowledged the vernacular stone architecture, the industrial heritage of water power in the valley and other important but small features such as dry stone walls, have also been removed from the plan. ASCs were intended as possible Conservation Areas, in waiting. These character features of Sheffield's industrial and agricultural heritage and small villages still need designated protected status, or upgrading to Conservation areas, before more is lost to piecemeal development.

**Area of High landscape value-** This designation has also been removed from the Map, but needs to be replaced with some equivalent designation as this is the area bordering the Peak District National Park.

**Change to designated planning areas-**

Support the extension of Local Wildlife Sites within the Loxley Valley from the area previously covered by Areas of Natural History Interest or ANHI sites and the additional LWS cover along the valley bottom and sides of the valley including around Storrs Brook and Load Brook, as well as along the Riggs Road.

Nearly all Loxley Common has been designated a local nature reserve (LNR) as well as an LWS. Loxley Valley also has exceptional biodiversity, described within the text of FOLV's submission, so would urge at least parts of the Loxley valley to be designated thus, to acknowledge and enhance the biodiversity of the valley.

**Conclusion-**

Having gone through the Draft Sheffield Plan I broadly support its aims and objectives it has for the City. To largely maintain the Green Belt by the reuse of land within the built environment, to create sustainable neighbourhoods within a sustainable city and to tackle the dual emergencies of Climate change and loss of biodiversity.

I would like to think that the policies put forward will, If properly resourced, create a better city to live in.

